UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK		
MACLAREN EUROPE LIMITED,	-X :	
Plaintiff,	: : . INIDE	EV No. 11 ov 4/00 (LID)
-against-	: INDE	EX No. 11 cv 4688 (HB)
ACE AMERICAN INSURANCE COMPANY,	: :	
a/k/a ACE USA,	: :	
Defendant.	•	

DECLARATION OF PAUL HUGEL IN OPPOSITION TO DEFENDANT'S MOTION TO DISMISS THE COMPLAINT

PAUL HUGEL, pursuant to 28 U.S.C. § 1746, hereby declares:

- 1. I am a member of the law firm of Clayman & Rosenberg LLP, attorneys for Plaintiff Maclaren Europe Limited in the above captioned matter. I offer this Declaration in opposition to Defendant ACE American Insurance Company's motion to dismiss the Complaint. The statements contained herein are based upon my own personal knowledge or upon information and belief.
- 2. True and complete copies of the following documents are annexed to this Declaration as set forth below:

Exhibit A	The Summons and Complaint filed in this matter
Exhibit B	A commercial liability insurance policy and endorsements thereto issued by ACE American Insurance Company to Maclaren USA, Inc. Maclaren Europe Ltd. and Maclaren Hong Kong Limited for the period March 10, 2004 through March 10, 2005
Exhibit C	A commercial liability insurance policy and endorsements thereto issued by ACE American Insurance Company to Maclaren Europe Ltd. and Maclaren Hong Kong Limited for the period March 10, 2005 through April 10, 2007

3. For the reasons set forth in the Memorandum of Law submitted herewith, Plaintiff respectfully requests that the Court deny Defendant's motion to dismiss the Complaint.

Dated: New York, New York October 5, 2011

I declare under penalty of perjury that the foregoing is true and correct

Paul Hugel